

### Multiple Ownership

The instant application and a separate application filed contemporaneously herewith together propose the assignment of WMFR(AM), High Point, NC, and WPCM(AM), Burlington-Graham, NC, to the Assignee. WMFR(AM) and WPCM(AM) are each located in the Greensboro-Winston Salem-High Point, NC, Nielsen Audio Metro (the “Greensboro Metro”). A total of 54 commercial and noncommercial educational full-power radio stations are located within or are reported by BIA as “home” to the Greensboro Metro.<sup>1</sup>

Grant of the instant application would result in the Assignee’s sole attributable party, Charles D. Marsh, having cognizable interests in the following three (3) commercial AM stations in the Greensboro Metro:

Call Sign	Location	Facility ID No.
WSML(AM)	Graham, North Carolina	740
WMFR(AM)	High Point, North Carolina	73257
WPCM(AM)	Burlington-Graham, NC	9082

Pursuant to Section 73.3555 of the Commission’s rules, in a Nielsen Audio market reported by BIA as having 45 or more commercial and noncommercial full-power radio stations, a party may have a cognizable interest in up to eight (8) full-power commercial radio stations, not more than five (5) of which may be in the same service.

Accordingly, Mr. Marsh’s proposed interest in a combination of three (3) AM stations in the Greensboro Metro complies with the Commission’s local radio ownership rule.

Mr. Marsh also has an attributable interest in WKHF(FM), Lynchburg, Virginia. WKHF(FM) is “home” to, and its community of license is located within the geographic boundaries of, the Roanoke-Lynchburg, VA, Nielsen Audio Metro. Because WKHF(FM) is not located in the Greensboro Metro, it is not relevant to the instant ownership compliance analysis.

Other than the stations referenced in this exhibit, neither the Assignee nor Mr. Marsh have any attributable interests in any other broadcast stations.

For the foregoing reasons, the Assignee’s proposed acquisition of WMFR(AM) and WPCM(AM) complies with the Commission’s multiple ownership rules.

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<sup>1</sup> See BIA FCC Geographic Market Definition for Greensboro-Winston Salem-High Point, NC, December 8, 2021.